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Attorneys for Defendant
Tower C. Snow, Jr.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RONALD F. GREENSPAN,

Plaintiff,

v.

TOWER C. SNOW, JR.,

Defendant.

Case No. C 05-02816 SI

**STIPULATION AND [PROPOSED] ORDER TO
CONTINUE CASE MANAGEMENT
CONFERENCE PENDING RULING BY
BANKRUPTCY COURT ON MOTION TO
APPROVE SETTLEMENT AGREEMENT**

Date: March 10, 2006
Time: 2:30 p.m.
Place: Courtroom 10

Judge: The Honorable Susan Illston

1 Plaintiff Ronald F. Greenspan, Trustee for the bankruptcy estate of Brobeck,
 2 Phleger & Harrison, LLP, and Defendant Tower C. Snow, Jr., by and through their respective
 3 counsel of record, hereby stipulate to continue the Case Management Conference scheduled in
 4 the above referenced case from March 10, 2006 at 2:30 p.m. to May 19, 2006 at 2:30 p.m. Good
 5 cause exists for accepting this stipulation, which is based on the following facts:

6 **Whereas**, Ronald F. Greenspan is the duly appointed Trustee for the Chapter 7
 7 bankruptcy estate of Brobeck, Phleger & Harrison, LLP;

8 **Whereas**, Ronald F. Greenspan filed this adversary proceeding in bankruptcy court
 9 to recover distributions that were made to Mr. Snow while Mr. Snow was a partner of Brobeck,
 10 Phleger & Harrison;

11 **Whereas**, the adversary proceeding was transferred to this Court;

12 **Whereas**, a Case Management Conference is scheduled for March 10, 2006 and
 13 Case Management Conference statements are due March 3, 2006;

14 **Whereas**, the parties engaged in a mediation on December 19, 2006;

15 **Whereas**, the parties have reached a settlement, which is subject to Bankruptcy
 16 Court approval;

17 **Whereas**, the Trustee filed a motion for approval of the settlement agreement with
 18 the Bankruptcy Court on March 1, 2006;

19 **Whereas**, the hearing on the motion to approve the settlement is scheduled for
 20 March 29, 2006; and

21 **Whereas**, the parties believe that no further proceedings are necessary in this case
 22 pending Bankruptcy Court review and approval of the settlement agreement.

23 **Now, therefore**, based on the foregoing facts, the parties stipulate to entry of an
 24 order as follows:

25 1. The Case Management Conference currently scheduled for March 10,
 26 2006 at 2:30 p.m. is continued to May 19, 2006 at 2:30 p.m. in Courtroom 10 of the United
 27 States District Court for the Northern District of California, San Francisco Division.

2. The parties shall submit Case Management Conference statements on or before May 12, 2006.

Dated: March 6, 2006

Respectfully submitted,

COOLEY GODWARD LLP

By: /s/ Jeffrey S. Karr
Jeffrey S. Karr

Attorneys for Defendant Tower C. Snow, Jr.

Dated: March 6, 2006

HENNIGAN, BENNETT & DORMAN LLP

By: /s/Bennett J. Murphy
Bennett J. Murphy

Attorney for Plaintiff Ronald F. Greenspan

ORDER

Pursuant to stipulation, it is so ordered.

Dated: March __, 2006



The Honorable Susan Illston
United States District Judge

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